



Natural Resources Wales
Llys Afon
Hawthorn Rise
Haverfordwest
Pembrokeshire
SA61 2BQ

My Ref: JM/NRW/JG2
Your Ref: Report ID: 021115/FP3097EZ

Date: 1st December 2015

Sent by e-mail

For the attention of Cathy Lloyd, Environment Officer

Compliance Assessment Report 2nd November 2015 - Site Drainage

Jay Metals

Wern Glyd, Cilrehdyn, Llanfrynach, Pembrokeshire, SA35 0AG,

Dear Ms Lloyd

Further to your comments in the Compliance Assessment Report (CAR) for Jay Metals and subsequent exchange of e-mails between us and discussions with Julie Young, I am instructed by Julie Young to help to clarify your concerns and resolve any misunderstandings with regards to the site design, drainage, operations and permit that Jay Metals currently operate to.

The CAR form records that there are two breaches of permit conditions:

- **Condition 2.3.1** - Site Drainage and Engineering
- **Condition 1.1.1** - Management System and Operational Procedures

We presume that both of these breaches relate to surface and roof waters from building on-site which fall onto and drain from the site via an interceptor and silt trap, and then finally to land adjacent to the southern perimeter of the site.

- **Summary of Recent History**

The proposed details of the changes to the drainage of the site and operational areas for depollution, treatment and storage areas used on-site were ***provided in a letter dated 17th May 2013*** to James Slowgrove Natural Resources Wales (NRW) Environmental Officer.

The proposed changes to the permit and required changes to the drainage and operations were then subsequently ***discussed and agreed*** with James Slowgrove and Lianne Bacon NRW ***during an arranged meeting at Jay Metals*** (which also included a joint inspection of the site and drainage areas) on ***27th August 2013***.

On ***30th January 2014*** James Slowgrove inspected the site and issued a ***CAR Form*** which did not record any permit breaches.

/...



On 21st March 2014 NRW issued a (NRW initiated) Variation Notice for Jay Metals to operate under a Standard Rules SR2014No14 permit to operate the site to accommodate the metal recycling operations in-line with agreed EMS and changes made to the drainage i.e. works to sealed

According to our records, **18 months later, since March 2014** when the permit was varied and issued by NRW, **until recently (CAR Form 2nd November 2015)** we have no other correspondence or Compliance Inspection Reports from NRW regarding concerns or compliance with the permit or site drainage .

It is therefore, very surprising that now Jay Metals is being accused by NRW of:

- non-compliance for a permit that was agreed and issued by you;
- non-compliance in connection to works to drainage that was agreed by you, and;
- non-compliance in connection with a management system (EMS) that was accepted by you.

Jay Metals would like to resolve any issues you have and where necessary make changes to the permit, site or operations, however **before we can progress or proceed further we seek confirmation from you on the following 2 questions** to avoid any further confusion in the future:

- NRW wrongly issued a permit variation to Jay Metals.

or;

- Your interpretation of Condition 2.3.1 wrt storage only on hardstanding areas (without sealed drainage implied) is wrong.

I hope my comments are clear and I look forward to your reply.

Yours sincerely

Joe Gatley

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